

# CLIFTON BUDD & DEMARIA, LLP

ATTORNEYS AT LAW

THE EMPIRE STATE BUILDING  
350 FIFTH AVENUE, 61ST FLOOR  
NEW YORK, NY 10118

TEL (212) 687-7410  
FAX (212) 687-3285  
www.cbdlm.com

IAN-PAUL A. POULOS  
ASSOCIATE  
E-MAIL: IAPOULOS@CBDM.COM

December 17, 2021

**VIA ECF**

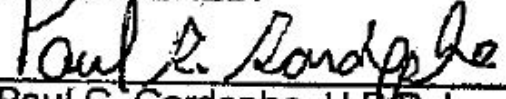
Hon. Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, NY 10007

Re: Request to Extend Briefing Schedule  
*Watkins v. Anthony T. Rinaldi, LLC et al.*  
1:19-cv-08457-PGG-JLC

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** December 20, 2021

Dear Judge Gardephe:

This firm represents the Defendants in the above-referenced action. Pursuant to Paragraph I(D) of Your Honor's Individual Rules of Practice, the Defendants write with Plaintiff's consent to respectfully request an extension of the briefing schedule regarding summary judgment. *See* ECF Doc. 62 & 64. The reason for the extension is because two of the undersigned's family friends passed away this month, and the undersigned requires a brief three-week extension as a result.

The current schedule is as follows: (1) December 30, 2021 (Defendants' moving papers); (2) January 31, 2022 (Plaintiff's opposition); and (3) February 17, 2022 (Defendants' reply). *See* ECF Doc. 64.

The proposed briefing schedule is as follows:

- Defendants' motion is due on January 20, 2022;
- Plaintiff's opposition is due on February 21, 2022;
- Defendants' reply, if any, is due on March 10, 2022.

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This is the second request to extend Your Honor's briefing schedule. Granting this request will not affect scheduled dates other than those indicated above.

Thank you for Your Honor's consideration.

Respectfully submitted,  
CLIFTON BUDD & DeMARIA, LLP  
*Attorneys for the Defendants*

By:   
\_\_\_\_\_  
Ian-Paul A. Poulos

CC: Counsel of Record (via ECF)